The protection of personal data is governed in France, by the General Data Protection Regulation of April 27, 2016, better known as the RGPD, and by the amended Data Protection Act of January 6, 1978.

Casino Guichard-Perrachon (hereinafter referred to as « we » or « us ») is a French limited company (« Société Anonyme ») with a Board of Directors. Its registered office is located at 1 Cours Antoine Guichard – 42 000 Saint Etienne, France, and it is registered under number 554 501 171 32465 with the Saint Etienne trade and companies registry.

As a data controller, we are committed to protecting our shareholders' (hereinafter referred to as « you ») data, which we process for the purposes of our relationship. This is why enforcing the data protection principles is essential.

In this respect, we set out in this policy how we collect, process and use your personal data (hereinafter your « Data »)

1. What data do we collect?

As part of our relationship with you, we may collect the following data, mainly your name, surname, date of birth, postal address, e-mail address, landline or mobile telephone number, shareholder ID number.

As a general rule, your Data is communicated to us indirectly by account-holding organisations for shareholders. We may also collect your Data directly when you provide it to us.

2. When do we collect your Data?

Your Data may be processed when we monitor and support the shareholders relationship. This processing is necessary for the execution of pre-contractual and contractual measures.

Your Data may also be processed when we (i) identify your country of residence in accordance with the law, (ii) send you newsletters, (iii) have to defend our interests (prevention and fight against fraud, litigation) or respond to requests from public authorities, (iv) carry out reporting and statistical analysis. Such processing may occur in accordance with our legitimate interests and, where applicable, with our legal obligations.

Finally, your Data may be processed when you exercise your rights on your Data or in order to enable us to meet our legal obligations.

You may communicate third party's data to us, in particular in the context of powers/mandates of representation (e.i. for General Assembly). In this case, you guarantee that you have their consent, and you must inform us as soon as they decide to withdraw it.

3. Who may collect your Data?

We ensure that only authorized persons subject to an obligation of confidentiality have access to your Data. These recipients may be authorised personnel from departments responsible for processing shareholder relations and support functions (legal, administrative and financial, communications/investors' relations, general services, security, compliance, information systems, etc.) of the Company, centralized intra-group departments, as well as from other Groupe Casino Companies.

With respect to data recipients external to the Groupe Casino, Data may be communicated to account-holding organisations for shareholders, and to third-party service providers specializing in support of operational and support functions.

Operations with such data recipients are framed by suitable agreements in order to ensure that your Data is protected and your rights are enforced.

In the event of data transfers outside the European Union territory, we ensure that the country of transfer offers an adequate level of data protection or that appropriate safeguards and guarantees are implemented. These guarantees may be the conclusion of a data transfer agreement based on the Standard Contractual Clauses (SCCs), as adopted by the European Commission, and/or any other mechanism approved by the supervisory authorities.

We may be required to disclose your Data in the event of requests/orders issued by public or judicial authorities, in particular to meet national security, anti-fraud or law enforcement requirements. In such cases, we cannot be held liable nor responsible for the conditions under which such authorities process your Data.

4. How long is your Data stored?

Data retention duration comply with legal and regulatory requirements:

Categories of personal data	Storage rules
Identification and contact data	Duration of the shareholding relationship

At the end of these periods, we may archive your Data, in particular to comply with the legal retention prescriptions for legal action or our legal obligations. Your Data is then either deleted or anonymized, being specified that these operations are irreversible and that we are subsequently incapable to restore it.

5. Our security and privacy commitments

Preserving the confidentiality and security of your Data is our priority.

We ensure that the implementation of organizational and technical security measures are appropriate with respect to the sensitivity of your Data, so as to protect them against any malicious intrusion, loss, alteration, or disclosure to unauthorized third parties. The implementation of such measures may warrant the assistance of any third party of our choice to potentially conduct vulnerability audits or intrusion testing. These measures are reviewed and updated as necessary.

In the design, development, selection, and use of our services, we take into account the privacy by default and/or privacy by design principles. For example, we may pseudonymize or anonymize your Data as soon as possible or necessary.

In a continuous effort for security and protection, we encourage you to keep cautious to prevent unauthorized access to your Data and to protect your devices (computer, smartphone, tablet) against any unwanted or malicious access.

6. How to exercise your rights?

You have the right to access, rectify, delete your Data, and, where applicable, the right to restrict the processing of your Data and/or the right to data portability. You may also object, on legitimate grounds, to the processing of your data.

To exercise your rights, you can contact us by email at actionnaires@groupe-casino.fr or by postal mail at the aforementioned address.

Proof of identity may be requested in case of doubt about the identity of the requester.

Furthermore, you have the right to lodge a complaint with the competent authority (in France, the CNIL).

You can contact our Data Protection Officer (DPO) at the following address: informatique-et-libertes@groupe-casino.fr.

This policy will be updated as needed

Version July 2021